

Dechert
LLP

Arnold & Porter

ROGER BURLINGAME, Dechert
Partner

+44 20 7184 7333 Direct
+1 212 641 5682 Direct
Roger.Burlingame@dechert.com

MICHAEL KIM KROUSE, Arnold & Porter
Partner

+1 212.836.7750 Direct
Michael.Krouse@arnoldporter.com

May 29, 2025

BY ECF

Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *United States v. Keonne Rodriguez, et al.*, 24 Cr. 82 — Letter Motion to File
Overlength Brief**

Dear Judge Berman:

Pursuant to the Court's Individual Rules, Defendants respectfully request permission to exceed 25 pages in their memorandum of law in support of their joint motion to dismiss the indictment. Defendants estimate that their memorandum of law will be approximately 35 pages.

The additional space will allow the separate defendants to coordinate their joint motions in a single submission and to provide the necessary legal, regulatory, and factual background to demonstrate how the law applies in the context of evolving technology and a complex regulatory scheme.

The government consents to this request.

Respectfully submitted,

/s/ Michael Kim Krouse
Michael Kim Krouse
Roger A. Burlingame
Matthew L. Mazur